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DANIEL BOGDEN
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IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEVADA

JONATHAN GOLDSMITH,
an individual,

Plaintiff,

v.

INTERNAL REVENUE SERVICE,
a United States Government Entity,

Defendant.

Case No. 2:15-cv-02431 RFB GWF

**MOTION TO AMEND SCHEDULING
ORDER
[First Request]**

Comes now the defendant, the United States of America, pursuant to Local Rule IA 6-1 and LR 26-4, to hereby request that the Court modify the scheduling order in this case, and states the following in support:

The Court issued a Scheduling Order in this case on April 8, 2016. In accordance with the Court's order, the following deadlines are currently in effect:

Dispositive Motions September 21, 2016

Pre-trial Order October 21, 2016

The parties have completed all discovery in this matter. A hearing on the United States Motion to Dismiss is scheduled for September 22, 2016. The United States requests that the dispositive motion date be continued, if necessary, until 30 days after the Court rules on the Motion to Dismiss. This request is not meant for delay but rather to conserve costs and resources.

Specifically, the United States respectfully requests that the Court amend the Scheduling Order as follows:

Dispositive Motions	If necessary, due 30 days after the Court rules on the pending Motion to Dismiss
Pre-trial Order	If necessary, due 60 days after the Court rules on the pending Motion to Dismiss

In the event dispositive motions are filed, the date for filing the proposed joint pre-trial Order shall be suspended until thirty (30) days after decision of the dispositive motion or further Order of the Court.

CAROLINE D. CIRAOLO
Deputy Principal Assistant Attorney General


/s/ Virginia Cronan Lowe
VIRGINIA CRONAN LOWE
Trial Attorney, Tax Division
U.S. Department of Justice

Of counsel:
DANIEL BOGDEN
United States Attorney

Attorneys for Defendant

Dated: September 13, 2016

IT IS SO ORDERED.


GEORGE FOLEY, JR.
United States Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of September, 2016, I electronically filed the foregoing
MOTION TO AMEND SCHEDULING ORDER [First Request] using the CM/ECF system,
which will send notification of such filing to the following:

Jonathan B. Goldsmith, Esq. at jonathan@vegaslawsite.com

/s/ Virginia Cronan Lowe
VIRGINIA CRONAN LOWE
Trial Attorney, Tax Division
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